

1 BY MR. SCHONMAN:

2 Q Mrs. Duff, your position with TBN at this time was
3 assistant to the president?

4 A Yes.

5 Q That's a full-time position?

6 A Yes.

7 Q It always has been a full-time position. Is that
8 correct?

9 A Yes.

10 Q Are you, are you and have you always been a salaried
11 employee of Trinity, with the exception of those first few
12 weeks I think you testified to?

13 A Yes, that's correct.

14 Q So from approximately 1980 to the present you've
15 been a salaried employee?

16 A Yes.

17 Q Would you turn to your direct testimony, please?

18 JUDGE CHACHKIN: What page?

19 MR. SCHONMAN: Beginning at page 36.

20 JUDGE CHACHKIN: The witness has been asked to look
21 at TBF Exhibit 101, page 36.

22 MR. SCHONMAN: Thank you, Your Honor.

23 BY MR. SCHONMAN:

24 Q Actually, I think we can start on page 35,
25 paragraph 53. And I'd like you to direct your attention at

1 paragraph 53, and it runs on for a page-and-a-half, page-and-
2 three-quarters.

3 A Yes.

4 Q Have you looked at that?

5 A Yes.

6 Q You do a lot of, lot of things for NMTV, according
7 to this. Is that correct?

8 A I'm the decision-maker.

9 Q You carry on a lot of activities for, for NMTV.

10 A My role with NMTV actually is to delegate and to
11 follow up and make sure that the station's management is
12 operating the station according to NMTV's policies.

13 Q Well, for example, on page 37 you say for NMTV, "I
14 have primary responsibility for negotiating NMTV's tower lease
15 in Portland."

16 A Oh, yes.

17 Q Those are among the things that, that you do and
18 have done?

19 A Yes.

20 Q You do these things while you're working at TBN?

21 A Yes, I do it from my office. I squeeze it in.

22 Q Is your salary that you receive from TBN in any way
23 affected by the duties you perform during your workday for
24 NMTV?

25 A You mean does TBN compensate me for anything that I

1 do for NMTV?

2 Q No?

3 A I, I don't --

4 Q Is it affected in any way?

5 A No.

6 Q Is it diminished?

7 A No, it, it doesn't change.

8 Q So part of your regular workday at TBN is, is
9 devoted to NMTV activities.

10 A Sometimes my workday extends beyond the normal 8:30
11 to 5:30.

12 Q Do you also carry on activities on behalf of
13 Community Educational Television?

14 A Yes.

15 Q And do you do that during your normal workday at
16 TBN?

17 A Sometimes it extends into the weekend, especially if
18 I have to travel.

19 Q Is your salary that you receive at TBN, is that
20 affected in any way by the activities you perform during your
21 workday for CET?

22 A No.

23 Q Are you familiar with a company named Jacksonville
24 Educational Broadcasters?

25 A Yes.

1 Q What is Jacksonville Educational Broadcasters?

2 A It consists of two educational stations that I'm on
3 the board of directors for these. And one is located in Fort
4 Pierce and the other in Jacksonville.

5 Q And who else is on the board? Who else, who else is
6 also on the board of that company?

7 A Mr. Crouch.

8 Q Paul Crouch?

9 A Yes. Ms. Crouch, Norm Juggert, Keith Deal, Gregory
10 Dampier, Julia Blanchard, and Keith Deal.

11 Q Do you perform activities on behalf of the
12 Jacksonville company during your normal workday at TBN?

13 A From time to time.

14 Q Is that salary that you receive from TBN affected in
15 any way by the activities that you perform during your normal
16 workday on behalf of the Jacksonville company?

17 A No.

18 Q Thank you.

19 JUDGE CHACHKIN: We'll go for about 5 minutes and
20 then we'll have a 10-minute recess.

21 BY MR. SCHONMAN:

22 Q Mrs. Duff, we can turn now to Bureau Exhibit Number
23 177, and that's a handwritten -- the first page is a
24 handwritten note with a date 1/14/88.

25 A Yes.

1 Q It appears to me that there is -- there are two
2 notes on page 1, one on the top and one on the bottom. Can
3 you explain what, what these two notes, these handwritten
4 notes, are all about? Well, strike that. The top portion
5 there appear to be initials. Do you know who, whose initials
6 they are?

7 A Phillip Crouch.

8 Q That's Phillip Crouch?

9 A Yes.

10 Q So Phillip Crouch wrote a note to you. That's the
11 top half?

12 A Yes.

13 Q And the bottom half is written by whom?

14 A That's my handwriting.

15 Q What is this all about, Mrs. Duff, if you recall?

16 A Apparently, Phil received a letter that he didn't
17 know how to respond to because he felt it was NMTV business
18 and he didn't -- this was something that he wouldn't have
19 responded to.

20 Q What was Phillip's, Phillip Crouch's position with
21 NMTV at the time?

22 A He was -- At that particular time --

23 Q Wasn't he an officer?

24 A He was, he was assistant secretary, I believe.

25 Q Of NMTV?

1 A Yes.

2 Q What was Phillip Crouch's position at TBN at this
3 time?

4 A I believe he was operations manager.

5 Q And what did he do in that capacity at TBN?

6 A He would have been a liaison for Mr. Crouch. He
7 would have been -- At Mr. Crouch's pleasure, he would do
8 whatever Mr. Crouch wanted him to do.

9 Q Now, if you turn to page 2 of Bureau Exhibit
10 Number 177, there's a note to Mr. Richard Ellis dated
11 January 18, 1988, from you in your capacity as assistant to
12 the president, and it's on TBN stationery. Didn't this letter
13 involve NMTV activities?

14 A It was kind of a -- How should I say it? This man
15 probably, since he was living in Vancouver Washington, was
16 probably receiving TBN's programs on the cable system up
17 there. I -- Since I don't have his letter, I can't be
18 absolutely sure if it -- And he would probably have gotten the
19 information because he watched the program where Paul made the
20 announcement. So that's -- I can't tell you any more than
21 that. I, I don't really know without having his letter.

22 Q Well, from the context of the handwritten notes on
23 page 1, wasn't this person writing for a job at the Portland
24 station? Is that what he was doing?

25 A Oh, yes, I misread that on the note here.

1 Q And you wrote back to him --

2 A Yes.

3 Q -- on TBN stationery --

4 A It should have been --

5 Q -- and identified yourself as assistant to the
6 president, which is your --

7 A That was an error.

8 Q -- was your position at TBN. Why was that?

9 A That was an error. It shouldn't have been on -- It
10 should have been more clear that it was not NMTV station.

11 Q Just a mere mistake?

12 A Yes.

13 Q I see. Bureau Exhibit Number 178, this is another
14 bill from May and Dunne dated January 18, 1988. It's directed
15 to Trinity Broadcasting Network and it includes charges for
16 services rendered to NMTV. Can you tell me why?

17 A I don't have anything else to add to my previous
18 answers.

19 Q Can you turn to Bureau Exhibit Number 179, please?
20 Mrs. Duff, do you have any knowledge as to what this, this
21 document is all about?

22 A This is when Mr. Miller asked for the assistance of
23 Smith and Powstenko in preparation for having to change the
24 site. We had originally planned to use Channel 49's site in
25 Portland and we were not able to get the environmental

1 clearances and so we had to modify the site. So this was
2 Mr. Miller's contact with Smith and Powstenko, ordering the
3 service.

4 Q When you say we, who are you referring to?

5 A This is items from National Minority, but Mr. Miller
6 had -- was acting at my request to provide this service from
7 Smith and Powstenko.

8 Q And it's on a Trinity Broadcasting Network form?

9 A It shouldn't have been.

10 Q That was another mistake, I assume.

11 A Yes, from Mr. Miller to --

12 Q Thank you.

13 MR. SCHONMAN: Your Honor, this is a good time to
14 break.

15 JUDGE CHACHKIN: Okay, a 10-minute recess.

16 (Off the record at 10:47 a.m.)

17 (On the record at 11:02 a.m.)

18 BY MR. SCHONMAN:

19 Q Mrs. Duff, we're moving on to Volume Number 4 of the
20 Bureau's exhibits. And if you'll be kind enough to turn to
21 Bureau Exhibit Number 180, 180. That's the draft of the
22 Houston low power television construction permit that
23 Translator TV, Inc., had filed, correct?

24 A Yes.

25 Q Now, by this grant date, and you see it handwritten,

1 1/29/88 is the grant date of the Houston application?

2 A Yes.

3 Q Translator TV, Inc., had already changed its name to
4 NMTV, correct?

5 A Yes.

6 Q Do you know why this grant was made to Translator
7 TV, Inc., and not to NMTV?

8 A I don't know.

9 Q Let me ask you another question. Did --

10 JUDGE CHACHKIN: Did the, did the reporter get that,
11 that response?

12 REPORTER: Yes.

13 JUDGE CHACHKIN: Go ahead.

14 BY MR. SCHONMAN:

15 Q Did NMTV amend its Houston low-power application to
16 effectuate the name change?

17 A I don't really remember if we did or not.

18 Q Let's move on to Bureau Exhibit Number 182. And
19 that's an application for employment for an individual by the
20 name of Eve, E-V-E, W. -- I'm sorry, I'm getting tired. The
21 individual's name is Darlene Eve. The last name is Eve,
22 E-V-E.

23 A Yes.

24 Q Do you know who filled out this application? Well,
25 do you know who reviewed this application for employment?

1 A I believe the station manager, then Harold Prentice.
2 He was station manager and engineer, so he would have
3 interviewed this employee.

4 Q So Darlene Eve filled this application out at the
5 Odessa station?

6 A Yes.

7 Q And she would have interviewed with Mr. Prentice?

8 A Yes.

9 Q Now, how would Mr. Prentice have received a blank
10 application for employment? How would he have come to get
11 this so that he could provide it to Ms. Eve?

12 A I would have sent it to him probably.

13 Q This is a, a Trinity application for employment,
14 isn't it?

15 A Yes. We had -- At that time, NMTV didn't have its
16 own application, so we -- After this, we changed them, but
17 this was one of our first -- She was actually the first
18 employee that we had outside of Mr. Prentice. And maybe -- He
19 might have hired a, an assistant engineer. She was probably
20 the second person that was hired.

21 Q Did Mr. Prentice fill out an application for
22 employment?

23 A Yes.

24 Q Was that retained by NMTV?

25 A I'm, I'm not sure. He left several years ago. I

1 don't, I don't know if, if -- If we had it, we would have
2 submitted it. So I don't know whether those were retained
3 that far back.

4 Q Did he travel to California to TBN's headquarters to
5 apply for the position with NMTV?

6 A Yes, he did. He interviewed with me.

7 Q Did he interview with anyone else?

8 A With Ben Miller.

9 Q Ben Miller?

10 A Yes.

11 Q Did Mr. Prentice have any prior relationship with
12 TBN?

13 A Not to my knowledge. He didn't tell me that he had
14 any previous experience with TBN.

15 Q And you based your decision to hire Mr. Prentice on
16 Ben Miller's review of Mr. Prentice?

17 A Of course, I relied on Mr. Miller's advice for the
18 engineering qualifications, but, of course, I interviewed him
19 with the idea that this man was also going to be the station
20 manager. So I definitely had a long talk with him myself.

21 JUDGE CHACHKIN: What is the role of the station
22 manager at NMTV?

23 MRS. DUFF: The station manager would be responsible
24 for the everyday activities of the station. That person would
25 be responsible for being the liaison with the community on

1 | behalf of the station. He'd be responsible for hiring the
2 | employees. He would be responsible for scheduling them and
3 | reviewing and evaluating their performance and firing them,
4 | you know, if necessary.

5 | JUDGE CHACHKIN: Does he have any engineering
6 | responsibility?

7 | MRS. DUFF: He would have total engineering
8 | responsibilities. This is a small station, so it, it's not as
9 | awesome as it seems, because it would be a very small station.
10 | But those were his responsibilities. And he also had an
11 | assistant chief that assisted him with the engineering --

12 | JUDGE CHACHKIN: Well, did Mr. Prentice have any
13 | engineering background?

14 | MRS. DUFF: Oh, yes, sir.

15 | BY MR. SCHONMAN:

16 | Q Mrs. Duff, could you turn to page 3 of Bureau
17 | Exhibit Number 182? That's the last page of Darlene Eve's
18 | application for employment. Do you have that before you?

19 | A One -- 182.

20 | Q Bureau Exhibit 182, page 3. That's the last page of
21 | Darlene Eve's application for employment.

22 | A Yes.

23 | Q Now, if you notice, the last paragraph of that
24 | application, and this is for a job with NMTV, it says, "Should
25 | I terminate my employment with TBN," and then it continues, "I

1 will be paid for any unused vacation time," et cetera, et
2 cetera. My question for you is what company was she applying
3 to work for when she filed this application for employment,
4 TBN or NMTV, Mrs. Duff?

5 A NMTV.

6 Q Why is there that reference to TBN in the last
7 paragraph of page 3?

8 A Well, I was using TBN's application forms until I
9 got my own application forms, which I did get. But,
10 obviously, I overlooked that last reference to TBN, which I
11 had changed everything else.

12 Q That's just another mistake?

13 A Yes.

14 Q I think we can move on to Bureau Exhibit Number 183.
15 That's an invoice from the law firm of May and Dunne directed
16 to Trinity Broadcasting Network, and it includes charges for
17 services rendered to NMTV. See that?

18 A Yes.

19 Q Can you tell me why NMTV is included in this invoice
20 once again?

21 A I don't have any further additions to my answer to
22 that.

23 Q If we can turn to Bureau Exhibit Number 18,
24 Mrs. Duff. Can you explain what this is?

25 A This looks like an order for a piece of equipment

1 for Odessa.

2 Q And Ben Miller requisitioned this --

3 A Yes.

4 Q -- on behalf of NMTV?

5 A Yes.

6 Q Do you see the -- at the bottom there's a box for
7 "authorized by"?

8 A Yes.

9 Q There are initials in that box. Whose initials are
10 those, if you know?

11 A Ben Miller and Mr. Crouch's.

12 Q And there are initials just above that box. Whose
13 initials are those, do you know?

14 A I don't, I don't really recognize those. That may
15 an accounting department or -- I don't, I don't know.

16 Q Now, this form is a Trinity Broadcasting form,
17 correct?

18 A Yes.

19 Q Why is that?

20 A I guess Mr. Miller at that time didn't recognize the
21 importance of using -- This was their, this was their stock
22 form and I guess he thought because he indicated the items
23 were for KMLM that that would be sufficient for the accounting
24 department to pick up that this was an expense for KMLM.

25 Q So this was not a mistake?

1 A In retrospect, I probably would have preferred to
2 use an NMTV purchase order, but at that particular time I
3 guess I wasn't focused on the importance of -- As long as it
4 had that identification there, I knew that the accounting
5 department would be able to pick it up.

6 Q So if I understand this form correctly, equipment is
7 being purchased from Hewlett-Packard and it's being shipped to
8 Trinity Broadcasting in Arizona for the NMTV station. Am I
9 reading that correctly?

10 A There's something about that that I don't
11 understand, but I'm sure that it's -- It's something maybe Mr.
12 Crouch would respond to, but I don't have an understanding of
13 why it would be shipped there. But Arizona, I guess, isn't
14 that far from New Mexico. I don't understand exactly, so --

15 Q If you flip to the next page, Bureau Exhibit
16 Number 186, and this is another -- Well, strike that. Do you
17 know what this is?

18 A This is the, the main transmitter equipment for the
19 station.

20 Q And that was requisitioned by Ben Miller?

21 A Yes.

22 Q And again, it's on Trinity Broadcasting Network, a
23 Trinity Broadcasting Network form, correct?

24 A But it was itemized for National Minority, Odessa,
25 Texas.

1 Q Was it a mistake again that Mr. Miller used a
2 Trinity form?

3 A Well, at this early point, I think that this was the
4 way that it was done, until we decided that it would be easier
5 if we just had our own purchase orders, which we did. But at
6 this point, this was the earliest thing that we did as far as
7 building for NMTV.

8 Q Uh-huh.

9 A And this was actually the procedure at that early
10 point.

11 Q A moment ago you just said it would be easier to use
12 an NMTV form. Well, why would it be easier?

13 A Well, it would probably -- I at one point decided
14 that it would be better to use an NMTV purchase order form and
15 it would stand out better for the accounting department to
16 pick it up, even though it did have the item indicating that
17 it was for -- But it would be easy to make an error like that
18 in the accounting department. So we decided later on that we
19 needed to have NMTV purchase orders.

20 Q And your reference to accounting department is to
21 TBN's accounting department, correct?

22 A Right. But they had to make the correct entries in
23 NMTV's books, and I just thought it would be easier, once we
24 got the money, to, to do an NMTV purchase order. But at this
25 time, they hadn't started using those.

1 JUDGE CHACHKIN: But there were separate entries
2 made also with other Trinity subsidiaries, weren't there?
3 When allocations were made for particular equipment for one of
4 the Trinity subsidiaries, wasn't there a separate entry made
5 as to, to whose account the, the item would be allocated?

6 MRS. DUFF: Yes, but I just wanted it to stand out
7 more. I just thought it would be better since we were a
8 separate company.

9 JUDGE CHACHKIN: So there was no difference really
10 in purchase orders for an accounting insofar as allocations.
11 They treated National Minority the same way that they treated
12 all other Trinity subsidiaries. Namely, they, they separated
13 the specific accounts and items, didn't they?

14 MRS. DUFF: They separated them in -- I believe that
15 there was more of a distinction with, with NMTV.

16 JUDGE CHACHKIN: What, what more was there a
17 distinction as far as the accounting department is concerned?

18 MRS. DUFF: Because they would have the -- I don't
19 think -- Well, I don't have any, any point of reference. So
20 I, I'd rather not address it since I don't have a point of
21 reference, 'cause I don't have anything in front of me to show
22 you the difference. There would be a -- There would be some
23 difference.

24 JUDGE CHACHKIN: Go ahead, Mr. Schonman.

25 BY MR. SCHONMAN:

1 Q Mrs. Duff, we can move on to Bureau Exhibit
2 Number 187, 187. Is that another purchase order requisitioned
3 by Ben Miller?

4 A Yes.

5 Q And it's on a Trinity form again?

6 A Yes.

7 Q At the bottom left, it says -- someone has written
8 in "To Carol." Do you know who Carol is?

9 A No. It's probably somebody in accounting
10 department.

11 Q TBN's accounting department?

12 A I'm not even sure. I don't know who Carol is.

13 JUDGE CHACHKIN: Well, NMTV did use TBN's accounting
14 department.

15 MRS. DUFF: Oh, yes.

16 BY MR. SCHONMAN:

17 Q If we can move on to Bureau Exhibit Number 188,
18 that's an invoice from May and Dunne dated March 11, 1988.
19 It's directed to Trinity Broadcasting Network again and it
20 includes charges for services rendered to NMTV. Do you know
21 why NMTV is included in this bill?

22 A I don't have any more to add to that.

23 Q Bureau Exhibit Number 189. This is a -- Well,
24 strike that. What is this, if you know?

25 A This is a purchase order for equipment for the

1 Odessa station. It doesn't identify specifically what that
2 equipment is, but it's something that has already been quoted,
3 probably a -- obviously, a very large piece of equipment,
4 mostly transmitting equipment normally.

5 Q Now, this is on a Trinity form once again, correct?

6 A Yes.

7 Q At the bottom, there's -- It looks like someone
8 attached a piece of paper to the bill when they made a
9 photocopy of this. I'm not sure if it's part of the bill, but
10 there is a reference to a person named Lisa and a reference to
11 a person named Trina, I think it is. Do you see that?

12 A Yes.

13 Q Do you know who either of those individuals is?

14 A No. It's probably somebody in the accounting
15 department of Trinity.

16 Q Bureau Exhibit Number 190, that's an invoice from
17 May and Dunne. We're up to April 4, 1988, now. It's directed
18 to Trinity Network again and it includes charges for services
19 rendered to NMTV. And my question is why is NMTV included in
20 this bill?

21 A I don't have any further to, to add to that.

22 Q Can you explain what Bureau Exhibit Number 191 is?

23 A This is a purchase order for the septic tanks for
24 the facility at Midland Odessa.

25 Q Now, it -- in the box in the lower left, it says

1 "requisitioned by" and the name's B. Miller. Can I assume
2 safely that that's Ben Miller?

3 A Yes.

4 Q There's another name, J. Rinzer or --

5 A Oh, that's John Rimer.

6 Q Who is John Rimer?

7 A He was a contractor that we hired to do some of the
8 building, the actual building of the transmitter building.

9 Q Did Mr. Rimer also do work for TBN?

10 A Yes, he did.

11 Q We can move on to Bureau Exhibit Number 193. And
12 193 consists of two pages, and I'd like you to take a moment
13 to, to look at both. Now you'll notice that the total charges
14 on the second page, \$80.74, is the same as the amount on, on
15 the first page of this form, this Trinity form. Do you see
16 that?

17 A Yes.

18 MR. TOPEL: \$86.74.

19 MR. SCHONMAN: \$86.74, thank you, Mr. Topel.

20 BY MR. SCHONMAN:

21 Q Were these expenses that were expended by
22 Mr. Prentice, if you know?

23 A Yes.

24 Q Why is this -- On page 1, why is this form being
25 requisitioned by Ben Miller? What, what is his connection to

1 Mr. Prentice?

2 A I, I don't know. At this point, I don't have an
3 explanation for this one.

4 Q Were you Mr. Prentice's supervisor?

5 A Yes. He did interface with Mr. Miller and, most
6 likely, that's why he sent this to Mr. Miller. But this was
7 -- would be during the time that the station was under
8 construction and he would be in communication with him quite a
9 bit about the building of the station. There could have been
10 that this was in dispute because it might have been something
11 that Mr. Miller had specifically asked him to do that I wasn't
12 aware of, and that's why it went to Mr. Miller.

13 Q Are you --

14 A That's the type -- I'm sorry.

15 Q No, I apologize. You go -- You finish.

16 A No, I was just going to say I, I don't have a
17 specific memory of this, but that's the type of thing Harold
18 might have done -- I didn't tell you to do that, who did? And
19 Mr. Miller would have verified that. I had that experience
20 with, you know, with -- sometimes with the station --

21 Q So in other words, at this point in time,
22 Mr. Prentice is the station manager in Odessa?

23 A Yes.

24 Q And he, he accumulates expenses for auto mileage and
25 telephone calls and office supplies. And instead of sending

1 the bill for these expenses to you or to TBN's accounting
2 department, he sends it to Ben Miller?

3 A That was not the way it should have been done.

4 Q Well, was that the practice, though?

5 A That was not proper. No, it shouldn't have been
6 done that way.

7 Q We can turn to Bureau Exhibit Number 194, Mrs. Duff.
8 And why don't you take as much time as you need familiarizing
9 yourself with this document? It runs 15 pages.

10 (Pause)

11 A Yes.

12 Q Mrs. Duff, this is a compendium dated May 9, 1988,
13 from Colby May to you at Trinity Broadcasting Network,
14 correct?

15 A Yes.

16 Q Why did Mr. May prepare this?

17 A Gosh, I don't have a real recollection. It's
18 probably something that I had requested him to do.

19 Q Do you have any recollection at all as to why you
20 would have asked him to do this?

21 A Well, it's kind of a hodge-podge, an index of full-
22 power stations that I'm involved in and they're --

23 Q What do you mean, a hodge-podge?

24 A Well, there are a lot of different things that are
25 intermingled. It's a record of our filing dates, our grant

1 dates for various and sundry stations.

2 Q Well, let's look at page 2 of this document. It's
3 entitled "Index Trinity Broadcasting Network, Inc., Full-Power
4 TV Stations." Now, do you see item number 11?

5 A Yes.

6 Q It says Portland, Oregon. Is that NMTV's station in
7 Portland, Oregon?

8 A Yes. That's why I referred to it as a hodge-podge,
9 because these are not all TBN's facilities.

10 Q Look at number 12, Beaumont, Texas, what company
11 owned that station, Mrs. Duff?

12 A Community Educational Television.

13 Q Number 14, Harlingen, Texas, what company owned that
14 station?

15 A Community Educational Television.

16 Q Houston, Texas, number 15?

17 A Community Educational Television.

18 Q Number 16, Odessa, Texas?

19 A NMTV.

20 Q And, for example, number 3, Miami, Florida, who
21 owned that station?

22 A TBF.

23 Q Do you know why these full-power stations are
24 grouped together?

25 A No, I don't.

1 Q Well, did you -- I'm sorry. Did you ask Colby May
2 why they're grouped together?

3 A This was some years ago. I don't even remember this
4 list.

5 Q Let's turn to page 12. And they titled this page as
6 "Index Trinity Broadcasting Network, Inc., Low-Power TV
7 Authorizations." Do you see that?

8 A Yes.

9 Q Look down the page to item number 10. There's a
10 reference to Fresno, California. Was that NMTV's low-power
11 station in Fresno, California?

12 A I don't have any frame of reference since there's
13 nothing else here identifying it. You know, there's no
14 channel number or anything, so I couldn't even speak to that.

15 Q Does TBN, Trinity Broadcasting Network, have a low-
16 power station in Fresno, California?

17 A No.

18 Q Look at page 15, item number 85. There's a
19 reference to a low-power station at Houston, Texas. Is that
20 NMTV's station at Houston, Texas?

21 A I don't have any frame of reference since there's no
22 file numbers or channel numbers.

23 Q Did TBN have a low-power station in Houston, Texas?

24 A No.

25 Q Mrs. Duff, looking at page 15 -- I'm sorry, strike

1 that. Looking at page 12, for example, item number 10, the
2 Fresno, California, low-power station, as you sit here right
3 now, is there any question in your mind that that is a NMTV
4 station in Fresno?

5 A That's the only station that I'm familiar with that
6 would be on this list, but it just -- This list is just so
7 nondescriptive, so I just hesitate to make any -- say anything
8 exact, because this list is just obviously not very complete.

9 Q It's not complete?

10 A Well, I just -- when I say not complete, it doesn't
11 have any channel numbers, and that's why I hesitate to say
12 that that is what that's referring to. There was a reference
13 some time before in one of your questions, when you asked me
14 about a Channel 55 and a Channel 56, and there was some
15 confusion there. So I don't know for sure if this a reference
16 to something like that.

17 JUDGE CHACHKIN: Apparently, this, this is not the
18 entire document. Apparently, looking at the first page, it
19 tells you what it is. It's directed to you, Ms. Duff, and you
20 don't recall asking for this information as to all of TBN's
21 full-power and low-power authorizations and the procedural
22 dates? You don't have any recollection, even though this
23 document is directed to you from your counsel?

24 MRS. DUFF: No, sir. It is not something that I
25 would necessarily request. It might have been something that